

47823

CCRRES CONTROL
OUTGOING LTR NO

DOE ORDER# 5400.1

94-RF-12457

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC
ROCKY FLATS PLANT, P O BOX 464 GOLDEN COLORADO 80402-0464 • (303) 966 7000

December 19, 1994

94-RF-12457

Kurt Muenchow
Environmental Restoration Division
DOE, RFFO

OPERABLE UNITS (OU) 5 AND 6 ECOLOGICAL RISK ASSESSMENT METHODOLOGY SCHEDULE IMPACT MEETING MINUTES - ECM-079-94

Action Forward meeting minutes to the Environmental Protection Agency (EPA) and Colorado
Department of Public Health and Environment (CDPHE)

This letter transmits the minutes from the meeting with the regulatory agencies which presented the
impacts on the IAG Table VI milestones for OU5 and OU6 from the incorporation of the ecological risk
assessment methodology Attached are meeting minutes and copies of materials distributed at the
meeting

Please contact Neil Holsteen, of my staff, at extension 6987 if you have any questions


E C Mast
Manager, Operable Units No 5 - 7 Closures
Environmental Restoration Program Division

NAH cb

Orig and 1 cc - K Muenchow

Attachments
As Stated

DIST	LTR	ENC
AMARILLO ME		
BUFLINGAME AH		
BUSBY WS		
BRANCH DB		
CARNIVAL GJ		
DAVIS JG		
FERREIRA JW		
FRAY RE		
GES JA		
GLOVER WS		
GOLAN PM		
HANNI BJ		
HARMAN LK		
HEALY TJ		
HEDRHL T		
HILIG JG		
HUTCHINS NM		
JACKSON DT		
KELL RE		
KUESTER AW		
MARX GE		
MCDONALD MM		
MCKENNA FG		
MONTROSE JK		
MORGAN RV		
POTTER GL		
PIZZUTO VM		
RISING TL		
SANDLIN NB		
SCHWARTZ JK		
SETLOCK GH		
STEWART DL		
STIGER SG		
TOBIN PM		
VOORHEIS GM		
WILSON JM		
C. A. BICKER		
N. A. HOLSTEEN		
CORRES CONTROL	X	X
ADMN RECORD/080		
TRAFFIC		
PATS/T130G		

CLASSIFICATION

JCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER
DOCUMENT NUMBER
EVALUATION PER
CLASSIFICATION OFFICE

N REPLY TO RFP CC NO
N/A

ACTION ITEM STATUS
PARTIAL OPEN
CLOSED
LTR APPROVALS
N/A

ORIG & TYPIST INITIALS
NAH/CB

ADMIN RECORD

A 0006-000514

**Minutes and List of Attendees
for the Sitewide Ecological Risk Assessment Methodology Meeting
at the Environmental Protection Agency, Denver, CO
Monday November 21, 1994, 2:30 p.m.**

The purpose of the meeting was to discuss the schedule for completing Woman Creek and Walnut Creek ecological risk assessments (ERAs) and the potential impacts on the Phase I RFI/RI and Feasibility Study reports. The following topics were discussed (see attached handout that was distributed at the meeting by Frank V)

- History of the ERA portion of baseline risk assessments and reorganization of ERAs from an operable unit (OU) approach to a watershed-level approach using recent DOE and EPA guidance
- Scope of the watershed-level approach
- Deliverables for the watershed-level approach, including three sitewide technical memoranda (TMs), TM1—Assessment Endpoints, TM2—Sitewide Conceptual Model, and TM3—Contaminant of Concern Screening Methodology, and Problem Formulation TMs and ERA reports for Walnut Creek, Woman Creek, the Industrial area, and the Offsite area
- Proposal to decouple the ERA from the Draft RFI/RI Report to incorporate the watershed-level approach

The intention of the sitewide TMs is to allow continuous interaction with and encourage involvement of the agencies in the development of the sitewide ecological risk assessment methodology. By incorporating agency review of each TM in the RFI/RI schedule, agencies will be familiar with methodology used to develop each ERA. Each ERA would use methodology prescribed in the sitewide TMs and would present results and discussion of analyses unique to each ERA

Agencies will have 20 working days to review each TM. Following the delivery of draft TMs, meetings will be held to resolve issues (e g., exposure values, data interpretation). Informal courtesy copies of draft TMs may be given to agencies if schedules allow.

At EPA's (Bill F) suggestion, DOE will consider requesting a schedule extension for the OU5 and OU6 draft RFI/RI reports to allow incorporation of the drainage-level approach for the ERAs. Current estimates indicate that an approximate six-week delay in delivery of final RFI/RI reports would be needed to accommodate inclusion of the draft ERAs. Draft ERAs probably will be available for use in the feasibility studies. A contingency to the schedule change will be included stating that all agencies are in active consultation on the technical scope and schedule impacts

Action Item

EG&G will deliver a letter to EPA and CDPHE including a proposed schedule for the OU5 and OU6 RFI/RI reports by December 16, 1994. This written proposal will incorporate Colorado BTAG and other workgroup involvement, TM review, and the RFI/RI final dates

Ecological Risk Assessments for Woman and Walnut Creek Drainage's

History

- For three years, the Ecological Risk Assessment (ERA) portion of the Baseline Risk Assessments have been conducted on an Operable Unit (OU) basis. This arrangement was dictated by IAG organization and schedule.
- During the last several months, an attempt has been made to move to a more technically defensible approach based on watershed-level ERAs.
- Watershed-level ERAs would include evaluation of ecological risk from all sources (IHSSs) and/or portions of OUs included in a given drainage.
- The reorganization of ERAs also includes implementation of a methodology to be more consistent with current ERA theory and practice including recent DOE and EPA guidance.

Description

- ERA's to be generated for: Walnut Creek, Woman Creek, the Industrial area, and the Offsite area.
- Three site-wide technical memoranda (TM) will be produced:
 - Assessment Endpoint TM,
 - Conceptual Model TM,
 - Chemical of Concern Screen Methodology TM.

Ecological Risk Assessments for Woman and Walnut Creek Drainage's

Scope

- OU5 will address the areas from the following Operable Units:
 - OU1,
 - Portion of OU2,
 - OU5,
 - Portion of OU11,
 - OU4 and other sources in the Industrial Area that may affect ecological resources in the watershed.
- OU6 will encompass areas from the following Operable Units
 - Portion of OU2,
 - OU6,
 - OU7,
 - Portion of OU11,
 - OU4 and other sources in the Industrial Area that may affect ecological resources in the watershed.

June 22, 1994

2

June 22, 1994

3

Ecological Risk Assessments for Woman and Walnut Creek Drainage's

Why is ERA Schedule Delayed

- Difficulty in implementing an approach not consistent with the IAG
- Additional two months to complete three sitewide TMs
- Accomodate comments to the ERA from OU1

Proposal

- Decoupling of the ERA Report from the Draft RFI/RI Report for OU5 and OU6
- No impact on IAG milestones, only delayed delivery of ERA Report
- Will allow for the completion of a technically defensibly product
- Assumptions:
 - Screening Benchmark Database will be approved by EPA Region VIII and use of analogous methodologies for values not in the database
 - ERA Report will be reviewed by EPA/CDPHE in 20 days
 - COC Screening Methodology TM will be reviewed in 15 days
 - Convene the BTAG?
 - Notify EPA/CDPHE ahead of time to schedule review

Ecological Risk Assessments for Woman and Walnut Creek Drainage's

Milestone Impact

- Current OU5 IAG Milestones
 - Draft RFI/RI Report - July 21, 1995
 - Draft ERA Report to EPA/CDPHE - August 11, 1995
 - Final RFI/RI Report - January 17, 1996 - No Impact
- Current OU6 IAG Milestones
 - Draft RFI/RI Report - June 21, 1995
 - Draft ERA Report to EPA/CDPHE - July 11, 1995
 - Final RFI/RI Report - December 21, 1995 - No Impact
- Feasibility Study Impact
 - May impact TM1 for OU5 and OU6 if a No Action argument is proposed
 - No significant impact on OU5 Presumptive Remedy Schedule
 - OU2 will receive ECOCs at a date that will not impact the FS

List of Attendees

Name	Organization	Phone	Fax
Neil Holsteen	EG&G	966-6987	966-8663
Frank A. Vertucci	EG&G	966-3427	966-3029
Ed Mast	EG&G	966-8589	966-8663
Carol Bicher	EG&G	966-9100	966-8663
Mark Lewis	Stoller	546-4346	443-1408
Kelley Crute	Stoller	546-4440	443-1408
Bonnie Lavelle	EPA	294-1067	294-7559
Bill Fraser	EPA	294-1081	294-7559
Harlen Ainscough	CDPHE	692-3337	759-5355
Jeb Love	CDPHE	692-3511	782-4969
Kurt Muenchow	DOE/ER	966-2184	966-4871
Michael Guillaume	SAIC/DOE-ER	966-4208	966-4871
Frazer Lockhart	DOE/RFFO	966-7846	966-4871